

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

MARGARET MAZUR,	}	
	}	
Plaintiff,	}	No. 2:17-cv-00826-JFC
	}	
	}	
vs.	}	Judge Conti
	}	
SOUTHWESTERN VETERANS CENTER and	}	
DEPARTMENT OF MILITARY AND VETERANS	}	
AFFAIRS,	}	
	}	
Defendants.	}	<i>Electronically Filed.</i>

RESPONSE TO MOTION TO COMPEL (Doc. # 27)

AND NOW, come the defendants, Southwestern Veterans Center and Department of Military and Veterans Affairs (“the Defendants”), by their attorneys, Scott A. Bradley, Senior Deputy Attorney General, and Kenneth L. Joel, Chief Deputy Attorney General, Chief, Litigation Section, and respond to the Motion to Compel Release of Police Investigative Results of May 18, 2016 CCR # 91034 Subpoenaed on December 7, 2017 (Doc. # 27), previously filed by Plaintiff in this matter:

1. Plaintiff initiated this *pro se* employment rights action by filing a complaint with this Court on June 22, 2017. See Complaint (Doc. # 1).
2. The Defendants answered the Complaint on August 11, 2017, and the parties have since been engaged in discovery.
3. On or about December 26, 2017, Plaintiff filed a motion to compel seeking an order from this Court compelling the City of Pittsburgh Bureau of Police to release documents related to a police contact at the Southwestern Veterans Center on or about May 18, 2016.

4. The Defendants have turned over all City of Pittsburgh Bureau of Police documents in their possession related to this matter. This consists of the one page document attached to Plaintiff's Brief in Support at Exhibit A (Doc. # 28-1).

5. While the Defendants strongly disagree with Plaintiff's characterization of the related events described in her motion, they agree that the City of Pittsburgh Bureau of Police was contacted by officials at the Southwestern Veterans Center and agree that a police unit did respond to that location.

6. The Defendants are aware that the City of Pittsburgh has notice of this motion and has filed a response on behalf of the Bureau of Police.

7. The Defendants have no further response to the motion.

WHEREFORE, the Defendants respectfully request that the Court enter an appropriate order on Plaintiff's Motion to Compel (Doc. # 27).

Respectfully submitted,

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